

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

<p>CHARLENE CARTER,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Case No. 3:17-cv-02278-X</p> <p>NOTICE REGARDING COMPLIANCE WITH THE COURT’S INSTRUCTIONS FOR FILING DEPOSITION DESIGNATIONS</p>
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Plaintiff Charlene Carter (“Carter”), by and through her undersigned attorneys, hereby gives notice to the Court of her compliance with the Court’s request at the June 16, 2022 pretrial conference to file deposition designations for witnesses Sonya Lacore and Linda Rutherford.¹ Carter believes that Linda Rutherford is unavailable for trial. Carter does not believe that Lacore is unavailable for trial within the meaning of Federal Rule of Civil Procedure Rule 32(a)(4), and has made efforts to serve Lacore with a trial subpoena. Carter requests that the Court order Southwest to make Lacore available to testify at trial, as detailed in the parties’ June 29, 2022 status report, but has filed a deposition designation out of an abundance of caution.²

Carter further states that she received copies of Rutherford’s and Lacore’s deposition transcripts on Wednesday, June 29, 2022 at 9:55 a.m. CT and 9:57 a.m. CT respectively. Pursuant to the Court’s May 24, 2022 Amended Order, Carter has attached the full depositions for Sonya Lacore and Linda Rutherford to this notice.³

¹ Transcript of June 16, 2022 Pretrial Conference, Tr.164:19-165:18.

² See Dkt. No. 282, pp.6-8.

³ Dkt. No. 236, p.3 ¶b.

Dated: June 30, 2022

Respectfully submitted,

s/ Matthew B. Gilliam

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Certificate of Service

I hereby certify that on June 30, 2022, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ Matthew B. Gilliam